

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

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THOMAS M. FLOHR d/b/a EMERGING  
MARKETS GROUP,

Plaintiff,

v.

INTERNATIONAL BUSINESS ASSOCIATES,  
LTD.,

First Defendant,

INTERNATIONAL BUSINESS ASSOCIATES  
HOLDINGS CO., LTD., INTERNATIONAL  
BUSINESS ASSOCIATES (USA), INC., JOHN  
KEAN, JR., and STANLEY J. BROWNELL,

Second Defendants,

HARKEN ENERGY CORPORATION,

Third Defendant.

X FILE NO. 07 CV 2920 (RWS)

ECF CASE

11/16/08

*Sorrell  
Sweet  
USDJ*

*1-14-08*

**NOTICE OF MOTION AND MOTION FOR AN ORDER PERMITTING CONNELL  
FOLEY LLP TO WITHDRAW AS COUNSEL FOR DEFENDANTS INTERNATIONAL  
BUSINESS ASSOCIATES, LTD., INTERNATIONAL BUSINESS ASSOCIATES  
HOLDINGS CO., LTD., INTERNATIONAL BUSINESS ASSOCIATES (USA), INC.,  
JOHN KEAN, JR., AND STANLEY BROWNELL.**

PLEASE TAKE NOTICE that Pursuant to Local Civil Rule 1.4 and the attached affidavit of Peter J. Pizzi, sworn on June 11, 2007 (attached hereto as Exhibit "A") Connell Foley LLP, attorneys for defendants International Business Associates, Ltd., International Business Associates Holdings Co., Ltd., International Business Associates (USA), Inc., John Kean, Jr., and Stanley Brownell, will move before this Court on a date and time to be determined, before the Honorable Robert W. Sweet, United States District Judge, in Courtroom

1920 of the United States Courthouse located at 500 Pearl Street, New York, New York, for an Order permitting CONNELL FOLEY LLP to withdraw as counsel for Defendants International Business Associates, Ltd., International Business Associates Holdings Co., Ltd., International Business Associates (USA), Inc., John Kean, Jr., and Stanley Brownell, on the grounds that Defendant International Business Associates, Ltd., International Business Associates Holdings Co., Ltd., International Business Associates (USA), Inc., John Kean, Jr., and Stanley Brownell, has chosen to engage other counsel to defend it in the above-entitled related actions.

PLEASE TAKE FURTHER NOTICE that, if necessary, the time and date of this motion will be set by the parties or the Court.

Dated: June 11, 2007

s/ Peter J. Pizzi

Peter J. Pizzi, Esq. (PP6500)  
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International Business Associates Holdings Co.,  
Ltd., International Business Associates (USA),  
Inc. John Kean, Jr., and Stanley J. Brownell

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